



### Listing of Claims

1. (Previously Presented) A loan management system for managing syndicate loans, comprising:

a first dataset containing lender data, said lender data being related to a plurality of lenders;

a second dataset containing borrower data, said borrower data being related to at least one borrower;

a third dataset containing loan resource data, said loan resource data being related to a plurality of loan resources;

a processing engine coupled to said first, second and third datasets, said processing engine operable to access said first, second and third datasets, and operable to manipulate said lender data, said borrower data and said loan resource data contained in said first, second and third datasets;

a user interface coupled to said processing engine;

and wherein a user provides instructions to said processing engine through said user interface, said instructions causing said processing engine to access said datasets and process loan information related to a loan syndicate, said loan information comprising said lender data, said resource data and said borrower data.

2. (Original) A loan management system according to claim 1, further comprising:

a loan portion ownership transfer module operable to inform lenders in said loan management system of a first lender offering a loan portion for at least one of a sale and a trade;

said module being further operable to consummate said at least one of said sale and said trade, whereby recordation of a transfer of said loan portion ownership is made in said loan management system;

and said transfer module is further operable to notify said first lender and an other party to said transfer of consummation of said transfer.

3. (Original) A loan management system according to claim 1, wherein said resource data includes resource data related to at least one of a term loan type resource, a revolving credit type resource and a letter of credit type resource.

4. (Original) A loan management system according to claim 1, wherein said processing engine further comprises:

business logic including criteria for determining if parameters of a transaction are within appropriate value ranges, wherein said business logic is operable to receive and analyze a transaction request from said user through said user interface and operable to approve said transaction request based on said criteria.

5. (Original) A loan management system according to claim 1, wherein said first, second and third datasets are part of a relational database.

6. (Original) A loan management system according to claim 1, further comprising:

a set of funds transfer instructions for each of said plurality of lenders;

and each of said funds transfer instructions having a status indicative of whether said funds transfer instructions are at least pending or approved.

7. (Original) A loan management system according to claim 6, wherein said processing engine is operable to process an instruction from a representative of a lender to modify said status for

respective funds transfer instructions to pending thereby enabling approval of said funds transfer instructions.

8. (Original) A loan management system according to claim 7, wherein said representative is a first representative, and wherein said processing engine is operable to process an instruction from a second representative to change said status from pending to approved.

9. (Original) A loan management system according to claim 1, further comprising:

an agent fee calculation module operable to calculate an agent fee;

and said agent fee related to at least one of transactions for and amounts of said loan resources.

10. (Original) A loan management system according to claim 1, further comprising:

a user access authorization module;

and an access authorization level assigned to said user, whereby said user is granted access to various portions of said loan management system based on authorization accorded to said user by said user access authorization module determined by said access authorization level.

11. (Original) A loan management system according to claim 1, further comprising a contact list including contacts for said plurality of lenders and for said at least one borrower.

12. (Original) A loan management system according to claim 1, further comprising: an external data system coupled to said processing engine;

wherein said user can provide instructions to said processing engine through said user interface to access said external data system;

and said access to said external data system can be used to compare said loan information with external data, and import and export data.

13. (Original) A loan management system according to claim 1, wherein said processing engine is further operable to generate messages to at least one of said plurality of lenders, said at least one borrower and at least one contact related to said plurality of loan resources.

14. (Original) A loan management system according to claim 13, wherein said generated messages must be approved and released for transmission by a user having approval and release authorization.

15. (Original) A loan management system according to claim 14, wherein said generated messages contain all information needed to initiate a loan for use as one of said plurality of loan resources.

16. (Currently Amended) A method of managing a syndicate loan provided by a plurality of lenders, comprising:

- organizing a first dataset containing loan resource data, said loan resource data being related to a plurality of loan resources available to said plurality of lenders;

- organizing a second dataset containing borrower data, said borrower related to at least one borrower receiving said loan;

- organizing a third dataset containing lender data, said lender data related to said plurality of lenders;

- accessing said datasets through a user interface and manipulating said loan resource data, said borrower data and said lender data contained in said first, second and third datasets according to a set of rules related to loan parameters;

- providing loan information related to said syndicate loan, said loan information comprising said loan resource data, said borrower data and said lender data; and recording and tracking changes to said processed loan information.

17. (Original) A method of managing a loan according to claim 16, further comprising:

manipulating at least one of said loan resource data, said borrower data and said lender data to record a transfer of ownership in a portion of a loan;

and notifying a transferor and a transferee of said transfer.

18. (Original) A method of managing a loan according to claim 16, wherein said loan resources data relates to at least one of a term loan type resource, a revolving credit type resource and a letter of credit type resource.

19. (Original) A method of managing a loan according to claim 16, further comprising:

providing business logic in said set of rules, said business logic including criteria for determining if parameters of a transaction are within appropriate value ranges;

receiving and analyzing a transaction request from said user interface;

and approving said transaction request based on said business logic.

20. (Original) A method of managing a loan according to claim 16, further comprising:

receiving a set of funds transfer instructions for each of said lenders;

and providing a status for each of said fund transfer instructions of at least one of pending and approved.

21. (Original) A method of managing a loan according to claim 20, further including changing a status for one or more funds transfer instructions to pending thereby enabling approval of said funds transfer instructions.

22. (Original) A method of managing a loan according to claim 21, further including preventing a funds transfer instruction status from being changed from pending to approved by an individual that changes said funds transfer instruction status to pending.

23. (Original) A method of managing a loan according to claim 16, further comprising charging an agent fee for administering said loan resource data, said agent fee related to an amount of said loan resources.

24. (Original) A method of managing a loan according to claim 16, further comprising authorizing a user to access various portions of information related to said loan based on authorization accorded to said user.

25. (Original) A method of managing a loan according to claim 16, further comprising providing a contact list including contacts for said plurality of lenders and for said at least one borrower.

26. (Original) A method of managing a loan according to claim 16, further comprising:

connecting said datasets to external data systems;

and permitting said at least one user to access said external data systems to compare said loan information with external data, and import and export data.

27. (Original) A method of managing a loan according to claim 16, further comprising generating messages to at least one of said plurality of lenders, said at least one borrower and at least one contact related to said plurality of loan resources.

28. (Original) A method of managing a loan according to claim 27, further including approving and releasing said messages by a user having approving and releasing authorization.

29. (Original) A method of managing a loan according to claim 28, further including initiating a loan for use as one of said plurality of loan resources based on information contained in said message.

30. (Previously Presented) A syndicate loan management system, comprising:

a lender database containing lender data related to a plurality of lenders;

a borrower database containing borrower data related to at least one borrower;

a loan resource database containing loan resource data related to a plurality of loan resources;

a user interface operable to accept and process a command from a user;

a set of funds transfer instructions accessible to the user interface;

and a processing engine coupled to the lender database, the borrower database, the loan resource database and the user interface, the processing engine operable to access and manipulate the databases in response to at least one of a funds transfer instruction and the command from the user through the user interface to input, update and track information related to a syndicate loan composed of at least a portion of said plurality of loan resources provided by the plurality of lenders to the at least one borrower.

31. (Previously Presented) A syndicate loan management system, comprising:

a first dataset containing lender data, said lender data being related to a plurality of lenders;

a second dataset containing borrower data, said borrower data being related to at least one borrower;

a third dataset containing loan resource data, said loan resource data being related to a plurality of loan resources;

a processing engine coupled to said first, second and third datasets, said processing engine operable to access said first, second and third datasets, and operable to manipulate said lender data, said borrower data and said loan resource data contained in said first, second and third datasets;

logic rules in said processing engine operable to provide an approval of a transaction request when said logic rules are applied to transaction parameter ranges;

and a user interface coupled to said processing engine;

wherein a user provides instructions to said processing engine through said user interface, said instructions include said transaction request, and said instructions causing said processing engine to access said datasets and process loan information related to a syndicate loan, said loan information comprising said lender data, said resource data and said borrower data.

32. (Currently Amended) A method of managing a syndicate loan, comprising:

organizing a first dataset containing loan resource data, said loan resource data being related to a plurality of loan resources;

organizing a second dataset containing borrower data, said borrower data related to at least one borrower receiving said loan;

organizing a third dataset containing lender data, said lender data related to a plurality of lenders;

accessing and manipulating said data relating to a syndicate loan in said datasets through a user interface;

applying a set of rules to said data in said datasets to provide a determination of whether a transaction request submitted through said user interface should be approved based on parameters of said transaction request falling within a range of values;

and recording and tracking changes to said data in said datasets resulting from approved transaction requests.



33. (Previously Presented) A method of managing a syndicate loan, comprising:

providing a set of data accessible to user commands entered in a user interface, said set of data comprising:

- a) loan resource data related to a plurality of loan resources;
- b) borrower data related to a borrower receiving said syndicate loan; and
- c) lender data related to a plurality of lenders;

accessing and manipulating said set of data by entering commands through said user interface;

applying a set of rules to said set of data to provide a determination of whether a command entered through said user interface should be approved based on analyzing range values of command parameters;

approving a command based on said determination;

and recording and tracking changes to said set of data resulting from execution of said command, wherein at least one of said approved commands is a funds transfer instruction.

## **I. Introduction**

Claims 1-33 are pending in this application. By this amendment, claims 16 and 32 have been amended to correct minor typographical errors. Reconsideration in view of the forgoing amendments and following remarks is respectfully requested.

## **II. Rejections**

Claims 1, 10, 11, 13-16, 24-25, 27-29 stand rejected under 35 U.S.C. § 102(a)<sup>1</sup> over September 1997 Info World article by Tebbe (hereinafter “the Tebbe article”); claims 3, 5 and 18 stand rejected under § 103(a) over the Tebbe article; claims 9 and 23 stand rejected under 35 U.S.C. § 103(a) over the Tebbe article in view of the CFO Alert article titled “New Medium Brewing for Syndications,” (hereafter “the CFO Alert article”); claims 12 and 26 stand rejected under 35 U.S.C. over the Tebbe article in view of the Corporate EFT Report article titled “Internet Promises Lower Costs Loan Syndications,” (hereafter “the EFT Report article”); claims 6-8, 20-22 and 30 stand rejected under 35 U.S.C. § 103(a) over the Tebbe article in view of U.S. Patent 5,940,811 to Norris (hereinafter “the Norris patent”); claims 2 and 17 stand rejected under 35 U.S.C. § 103(a) over the Tebbe article in view of U.S. Patent 6,249,775 to Freeman et al.

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<sup>1</sup> The heading for this rejection states “Rejections under 35 USC § 102,” However, subsection (e) is recited below the heading. Applicants note that rejections under § 102(e) are based on patent applications by another. As the Tebbe article is not a patent application published by another, a rejection under § 102(e) would be improper. Applicants are further confused by the fact that the subsequent statement of the rejection specifies 35 U.S.C. § 103(a). Because the rejection appears to be an allegedly anticipatory rejection, Applicants have assumed that the examiner intended to reject these claims under § 102(a) — the appropriate paragraph for an anticipatory rejection based on a publication that appeared publicly before the invention thereof by applicant. Written confirmation of the intended rejection is respectfully requested.

(hereinafter “the Freeman patent”); claims 4, 19, 31 and 32<sup>2</sup> stand rejected under 35 U.S.C. § 103(a) over the Tebbe article in view of U.S. Patent 6,385,594 to Lebda et al. (hereinafter “the Lebda patent”); and claim 33 stands rejected under 35 U.S.C. § 103(a) over the Tebbe article in view of the Norris patent and further in view of the Lebda patent. Applicants respectfully traverse the rejections.

**A) Rejection of claims 1, 10, 11, 13-16, 24, 25 and 27-29**

Regarding the above claims, and in particular independent claims 1 and 16, Applicants respectfully submit that the Tebbe article fails to disclose a loan management system for managing syndicate loans, comprising, *inter alia*, a first dataset containing lender data, a second dataset containing borrower data, a third dataset containing loan resource data, a processing engine coupled to said first, second and third datasets, said processing engine operable to access said first, second and third datasets, and operable to manipulate said lender data, said borrower data and said loan resource data, and a user interface coupled to said processing engine, and wherein a user provides instructions to said processing engine through said user interface, said instructions causing said processing engine to access said datasets and process loan information related to a loan syndicate, said loan information comprising said lender data, said resource data and said borrower data, as recited in claim 1.

Similarly, regarding claim 16, Applicants submit that the Tebbe article fails to disclose a method of managing a syndicate loan provided by a plurality of lenders, comprising, *inter alia*, organizing a first dataset containing loan resource data, organizing a second dataset containing

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<sup>2</sup> Although the Office Action states that claim 32 is rejected based the Tebbe article in combination with the Norris patent and the Lebda patent, the rejection appear to rely solely on the Tebbe article in view of the Lebda patent.

borrower data, organizing a third dataset containing lender data, accessing said datasets through a user interface and manipulating said loan resource data, said borrower data and said lender data contained in said first, second and third datasets according to a set of rules related to loan parameters, providing loan information related to said syndicate loan, said loan information comprising said loan resource data, said borrower data and said lender data; and recording and tracking changes to said processed loan information, as recited in claim 16.

The Tebbe article abstractly discusses a system for creating loan syndicates over the Internet. In relevant portion the articles states:

IntraLinks, a start up company, has announced a new site and service for bank loop syndicators that can create loan syndicates over the Internet. Bank of America used its services to create a loan syndicate of 49 lenders for a \$4 billion line of credit for Compaq... Syndicates require an enormous amount of paperwork, and the Internet can greatly speed up the necessary activities. IntraLinks uses its IntraLoan site to allow authorized participants secure, easy access to all necessary deal documents and exploits the key strengths of the Internet to apply them to an existing process. Two big concerns are access control and security; the systems lets investors view only deals for which they are authorized, and all documents have digital certificates.

Based on this high level, abstract disclosure, the Examiner alleges that claims 1, 10-11, 13-16, 24, 25 and 27-29 are all anticipated. Applicants submit that the Examiner has failed to meet his burden under § 102 to the extent that each and every claim element is not explicitly or inherently taught by the Tebbe article. Moreover, Applicants submit that the differences between these claims and the Tebbe article would not have been obvious to a person of ordinary skill in the art given the sparse description provided by the Tebbe article.

For example, in claim 1, the specific claim elements of a first dataset containing lender data, a second dataset containing borrower data, a third dataset containing loan resource data,

and a processing engine coupled to said first, second and third datasets that is operable to access the first, second and third datasets, and operable to manipulate the lender data, borrower data and loan resource data are not disclosed in the Tebbe article. Rather, it appears the Examiner has made a rough analogy between these items and the stated “all necessary deal documents” from the article. Applicants object to this analogy.

In claim 16, the specific method steps of organizing a first dataset containing loan resource data, organizing a second dataset containing borrower data, organizing a third dataset containing lender data, accessing said datasets through a user interface and manipulating said loan resource data, said borrower data and said lender data contained in said first, second and third datasets according to a set of rules related to loan parameters, providing loan information related to said syndicate loan, and recording and tracking changes to said processed loan information are not disclosed. Rather, the Tebbe article merely discloses the abstract step of viewing deal documents on line.

Though Applicants believe that the dependent claims 10, 11, 13, 14, 24, 25 and 27-29 are patentable over the Tebbe article for at least the same reasons as claims 1 and 16, the Examiner’s rejections of these claims also suffers from various deficiencies.

In claim 11, and similarly in claim 25, the specific elements of a contact list including contacts for the plurality of lenders and for the at least one borrower is not disclosed. The Examiner appears to be asserting that this feature is inherent because the Tebbe article mentions security. Applicants disagree with this assertion.

In claims 13-15, and similarly in claims 27-29, the specific claim feature stipulating that the processing engine is operable to generate messages to at least one of the plurality of lenders,

the at least one borrower and the at least one contact related to the plurality of loan resources is not taught in the Tebbe article. Contrary to the Examiner's assertion, Applicants can not find any reference to processor engine-generated messaging in the system described in the Tebbe article, or further that messages must be approved and released by a user having approval and release authorization. The only "levels" of authorization discussed in the Tebbe article refers to persons only having access to documents pertaining to their deal — not to different levels within a deal.

Accordingly, for at least these reasons, Applicants respectfully request that the rejection of claims 1, 10, 11, 13-16, 24, 25 and 27-29 under § 102(a) be withdrawn.

**B) Rejection of claims 3, 5, and 18**

As these claims depend from independent claims 1 and 16, Applicants respectfully submit that claims 3, 5 and 18 are patentable over the Tebbe article for at least the same reasons set forth above in the context of claims 1 and 16.

**C) Rejection of claims 9 and 23**

Claim 9, and similarly claim 23, recites an agent fee calculation module operable to calculate an agent fee, and said agent fee related to at least one of transactions for and amounts of said loan resources. The Examiner acknowledges that the Tebbe article does not mention a fee calculation module. The Examiner relies upon the CFO Alert article to teach this feature. However, this article merely mentions that "IntraLinks charges a fee according to the size and complexity of the deal." This may correspond to the language of claim 9 stipulating that the fee is related to the amount of the loan resources, however, it does not explain how (*i.e.*, by what means) the fee is calculated. In claim 9 it is done with a fee calculation module operable to

calculate the fee. There is no suggestion or disclosure of such a module in the CFO Alert article. Accordingly, withdrawal of the rejection of claims 9 and 23 is respectfully requested on this basis, as well as for the reasons set forth in the context of independent claims 1 and 16.

**D) Rejection of claims 12 and 26**

Claim 12 and similarly claim 26 recites an external data system coupled to the processing engine, wherein the user can provide instructions to the processing engine through the user interface to access the external data system, and access to the external data system can be used to compare the loan information with external data, and import and export data. The Examiner admits that this feature is not taught in the Tebbe article. The Examiner relies on the EFT Report article to teach this feature. In relevant portion, this article states that “Using a standard web browser, authorized lenders can log onto the Intralinks web site, access the relevant loan documents, cut and past from them for internal memoranda...” Nowhere in this portion of the article is there mention of providing instructions to access an external data system that can be used to compare the loan information with external data or to import data. Rather, this discussion is limited to viewing the data with a web browser interface and cutting and pasting data out of the system into other application documents. Therefore, withdrawal of the rejection of claims 12 and 26 is respectfully requested on this basis, as well as for the reasons set forth in the context of independent claims 1 and 16.

**E) Rejection of claims 6-8, 20-22 and 30**

Claims 6-8, and similarly, claims 20-22, recite a set of funds transfer instructions for each of the plurality of lenders, each of the funds transfer instructions having a status indicative of whether the funds transfer instructions are at least pending or approved, wherein the processing

engine is operable to process an instruction from a first representative of a lender to modify the status for respective funds transfer instructions to pending, thereby enabling approval of the funds transfer instructions, and the processing engine is also operable to process an instruction from a second representative to change the status from pending to approved.

The Examiner acknowledges that these claim features are not taught by the Tebbe article. The Examiner relies on the Norris patent to teach these features. However, the Norris patent describes a kiosk terminal that allows users to apply for a loan and, if approved, to specify account information so that the loaned funds may be electronically transferred into the user's account from a lender. Nowhere in the portion of the patent relied upon by the Examiner is there discussion of: 1) a set of funds transfer instructions for each of a plurality of lenders, where each of the funds transfer instructions have a status indicative of whether the funds transfer instructions are at least pending or approved; or 2) the processing engine being operable to process an instruction from a representative of a lender to modify the status for respective funds transfer instructions to pending, thereby enabling approval of the funds transfer instructions; or 3) the processing engine being operable to process an instruction from a second representative to change the status from pending to approved. Because none of these claim elements are present in either the Tebbe article or the Norris patent, Applicants respectfully request withdrawal of the rejection of claims 6-8 and 20-22 for these reasons, as well as for the reasons set forth in the context of independent claims 1 and 16.

Regarding independent claim 30, Applicants respectfully submit that the disclosure of the Tebbe article in view of the Norris patent fails to disclose or suggest a syndicate loan management system, comprising, *inter alia*, a lender database containing lender data related to a plurality of lenders, a borrower database containing borrower data related to at least one



borrower, a loan resource database containing loan resource data related to a plurality of loan resources, a user interface, a set of funds transfer instructions accessible to the user interface, and a processing engine coupled to the lender database, the borrower database, the loan resource database and the user interface, that is operable to access and manipulate the databases in response to at least one of a funds transfer instruction and the command from the user through the user interface to input, update and track information related to a syndicate loan composed of at least a portion of said plurality of loan resources provided by the plurality of lenders to the at least one borrower.

As discussed above in the context of independent claims 1 and 16, the Tebbe article fails to disclose or suggest the specific claim elements of a lender database, a borrower database, and a loan resource database. The Examiner acknowledges that the Tebbe article fails to teach the features of a set of funds transfer instructions or that the processing engine is operable to access and manipulate the databases in response to a funds transfer instruction and to update and track information related to a syndicate loan composed of a at least a portion of the loan resources provided by the plurality of lenders. The Examiner asserts that these features are taught by the Norris patent and that as a result, it would have been obvious to a person of ordinary skill in the art to have modified the system described in the Tebbe article to incorporate them. Applicants disagree that the features are taught in the Norris patent. In the Norris patent, funds transfer instructions correspond to the borrower, that is the account to which he/she desires the funds to be transferred into. Lender system's interaction with regard to funds transfer instructions are automated in the system of the Norris patent, not done via an interface. Accordingly, in view of theses distinctions, Applicants respectfully request that the rejection of claim 30 be withdrawn.

**F) Rejection of claims 2 and 17**

Although these claims depend from independent claims 1 and 16 respectively, which, for the reasons asserted above, are believed to be patentable over the art of record, these claims stand rejected over a combination of references that includes the Freeman patent. The Freeman patent does not qualify as prior art against this patent because this application was filed on March 21, 2001, was co-pending with the Freeman patent (it issued on June 19, 2001) and was subject to an obligation of assignment to the same person at the time it was filed, namely The Chase Manhattan Bank. Accordingly, the rejection of at least these claims under § 103(a) based on any combination of references including the Freeman patent is improper and should be withdrawn.

**G) Rejection of claims 4, 19, 31 and 32**

Regarding claims 4 and 19, Applicants respectfully submit that these claims are patentable over the combination of applied references for at least the same reasons as independent claims 1 and 16.

Regarding independent claim 31, Applicants submit that the Tebbe article in view of the Lebda patent fails to disclose or suggest a syndicate loan management system comprising, *inter alia*, a first dataset containing lender data related to a plurality of lenders, a second dataset containing borrower data related to at least one borrower, a third dataset containing loan resource data related to a plurality of loan resources, a processing engine coupled to said first, second and third datasets, said processing engine operable to access the first, second and third datasets, and to manipulate the lender data, borrower data and loan resource data, logic rules in said processing engine operable to provide an approval of a transaction request when said logic rules are applied to transaction parameter ranges, and a user interface coupled to said processing engine, wherein a user provides instructions to said processing engine through said user interface, said instructions include said transaction request, and said instructions causing said

processing engine to access said datasets and process loan information related to a syndicate loan, the loan information comprising said lender data, said resource data and said borrower data.

The Examiner relies upon the Lebda patent to teach the elements corresponding to logic rules. However, as discussed above in the context of independent claims 1, 16 and 30, Applicants submit that the Tebbe articles fails to teach the specific structure of first, second and third datasets corresponding to lenders, at least one borrower and loan resources. The Lebda patent also fails to teach a processing engine having the specific functionality recited in this claim. These features would not have been obvious in view of the vague description provided in the Tebbe article. Accordingly, Applicants respectfully request that the rejection of claim 31 be withdrawn.

Regarding independent claim 32, Applicants submit the combination of the Tebbe article, the Norris patent and the Lebda patent fails to disclose or suggest a method comprising, *inter alia*, organizing a first dataset containing loan resource data related to a plurality of loan resources, organizing a second dataset containing borrower data related to at least one borrower receiving said loan, organizing a third dataset containing lender data related to a plurality of lenders, accessing and manipulating the data relating to a syndicate loan in the datasets through a user interface, applying a set of rules to said data in said datasets to provide a determination of whether a transaction request submitted through said user interface should be approved based on parameters of the transaction request falling within a range of values, and recording and tracking changes to said data in said datasets resulting from approved transaction requests, as recited in claim 32.

The Examiner relies upon the Lebda patent to teach the step of applying a set of rules to the data in the datasets. Without commenting on this assertion, Applicants submit that the Tebbe

article fails to explicitly recite or even suggest the steps of organizing the three datasets.

Therefore, Applicants submit that claim 32 is patentable over the combination of applied reference. Withdrawal of the rejection is therefore respectfully requested.

**H) The rejection of claim 33**

Regarding independent claim 33, Applicants submit that the combination of applied references fails to disclose or suggest a method comprising, *inter alia*, providing a set of data accessible to user commands entered in a user interface, that comprise a) loan resource data related to a plurality of loan resource, b) borrower data related to a borrower receiving the syndicate loan, and c) lender data related to a plurality of lenders, accessing and manipulating the set of data by entering commands through said user interface, applying a set of rules to said set of data to provide a determination of whether a command entered through the user interface should be approved based on analyzing range values of command parameters, approving a command based on the determination, and recording and tracking changes to the set of data resulting from execution of the command, wherein at least one of the approved commands is a funds transfer instruction..

As discussed above in the context of independent claims 1, 16, 30, 31 and 32 the Tebbe article fails to teach the core claim feature of providing a set of data accessible to user commands entered in a user interface, that comprise a) loan resource data related to a plurality of loan resource, b) borrower data related to a borrower receiving the syndicate loan, and c) lender data related to a plurality of lender. Therefore, because the neither the Norris patent nor the Lebda patent supply the deficiencies of the Tebbe article with respect to these claim features, Applicants submit that claim 33 is patentable over the combination of applied references. Accordingly, withdrawal of the rejection of claim 33 is respectfully requested.